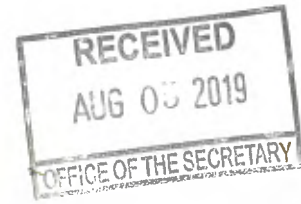


# *The Bank of South Carolina*

July 26, 2019

Vanessa Countryman, Acting Secretary  
Securities and Exchange Commission  
100 F Street, NE  
Washington, DC 20549-0609



File No. S7-06-19 – Amendments to the Accelerated and Large Filer Definitions

Dear Ms. Countryman,

I am writing to you today on behalf of The Bank of South Carolina to voice our support of the SEC's proposal to amend the definitions of accelerated and large accelerated filers. Under the proposal, companies with less than \$100 million in annual revenue would be exempt from ICFR auditor attestation as required by Section 404(b) of the Sarbanes-Oxley Act (SOX 404(b)). We are deeply appreciative that the SEC has proposed these changes and encourage the SEC to adopt these changes that will benefit our bank and those communities we serve in the greater Charleston area.

The Bank of South Carolina understands and agrees that regulatory measures, such as SOX 404(b), are necessary, but we emphasize to you that these measures should be tailored to the types of entities regulated so that there is minimal burdensome regulation. Exempting smaller companies with less than \$100 million in revenue from the ICFR auditor attestation requirement is an appropriate way to strike this balance for SEC-registered community banks such as ours. We also believe that defining banks as non-accelerated filers will not negatively affect investors' confidence in smaller companies. If these definitions are adopted, non-accelerated filers will still be subject to other requirements to establish, maintain, and assess the effectiveness of ICFR and for management to assess internal controls to protect investors.

Additionally, by adopting these proposed definitions, the SEC will reduce the compliance expense involved with SOX 404(b) auditing requirements for our bank and other small companies. As a result, more capital will be preserved and afforded the opportunity to be deployed in support of the numerous financing needs within the communities we and others serve.

We thank the SEC for proposing these changes and ask for their adoption and swift implementation.

Sincerely,

A handwritten signature in dark ink, appearing to read "E. Walpole, IV". The signature is fluid and cursive, with a large, stylized initial "E" and a long, sweeping underline.

Eugene H. Walpole, IV  
Executive Vice President & CFO